

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

RECEIVED

SEP 27 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:

Telephone Number Portability

CC Docket No. 95-116
RM 8535

Comments on Petitions for Reconsideration

DOCKET FILE COPY ORIGINAL

INTRODUCTION

The United States Telephone Association (USTA) respectfully submits these brief comments on the petitions for reconsideration of the Order released July 2, 1996, in the above-referenced proceeding,¹ pursuant to Sections 1.429 and 1.4(b) of the Commission's rules, 47 C.F.R. §§ 1.429, 1.4(b). These petitions were placed on public notice in the Federal Register on Thursday, September 12, 1996. USTA is the principal trade association of the Local Exchange Carrier (LEC) industry, and has been an active participant in implementing local number portability ("LNP"). USTA members will be both providers and beneficiaries of LNP.

DISCUSSION

I. The Commission Should Explicitly Acknowledge the Effect of the Rural Telephone Company Exemption From Interconnection Obligations

In the Order, the Commission noted that the 1996 Act exempts rural telephone companies from the "duty to negotiate ... the particular terms and conditions to fulfill the interconnection duties created by the 1996 Act, including the provision of number portability, and that carriers satisfying the statutory criteria contained in Section 251(f) may be exempt from the obligations to provide number portability as set forth herein." The Commission then deferred specific application of this statutory exemption to the number portability requirements to the proceedings

In the Matter of Telephone Number Portability, First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-286, CC Docket No. 95-116 (July 2, 1996) ("First Report and Order"). Notice of this Order appeared in the Federal Register on July 25, 1996.

No. of Copies rec'd
List A B C D E

Or 11

implementing Section 251 and 252. Order, para. 83; See First Report and Order, CC Docket 96-98, FCC 96-325 (August 8, 1996)(“Interconnection Order”).

The Interconnection Order did not reach a specific conclusion on this issue, and correctly deferred to state commission application of the Section 251(f) provisions of the new law. Interconnection Order, para. 1253.² Accordingly, USTA agrees with the Petition for Reconsideration filed by John Staurulakis, Inc.(“JSI”), which suggests that the Commission should therefore explicitly clarify the practical effect of Section 251(f)(1) on the obligation to provide LNP contained in Section 251(b) of the new Act, as implemented by the Order.

Specifically, the analysis in paragraph 83 of the Order was correct. The legislative history makes clear that the obligation to provide LNP only makes sense “in the context of a specific request” from an interconnecting carrier. See Petition of JSI at 5; Petition of USTA at 13-14, citing Conference Report at 121. Accordingly, it would make no sense for carriers to deploy LNP where no requests for interconnection are made, due to the rural telephone company exemption. JSI Petition at 5-6.³

The 251(f)(1)exemption only explicitly addresses Section 251© obligations, and does not grant an automatic exemption from Section 251(b) obligations such as local number portability. Consequently, absent specific action by the Commission on reconsideration, each and every rural telephone company would likely file with the Commission, requesting a waiver of the number portability deployment schedule. There is no basis for creating this unnecessary administrative burden. The Commission should modify its deployment schedule to provide that entities meeting the Act's definition of "rural telephone company" are not subject to the Commission's

²The Interconnection Order also noted that a rural telephone company is not required to make any showing until it receives a bona fide request for interconnection, Id., para. 1263.

³ Similarly, the Commission should clarify that companies who receive suspensions or modifications of the Section 251© requirements by order of a state commission are not subject to the deployment schedule in the initial Order.

deployment schedule while they are exempt from interconnection obligations by operation of Section 251(f).

Should the exemption, suspension or modification terminate by order of a state commission, that state commission should determine when the rural company at issue should be required to make available long-term local number portability. Permitting state commissions to determine the deployment schedule for local number portability for companies subject to the Section 251(f) provisions is necessary to preserve state authority over the full range of issues involved in competition and interconnection for smaller and rural LECs. And it is consistent with the Interconnection Order's determination that state commissions should address these questions regarding economic burden of interconnection obligations, including LNP.

This arrangement also makes sense as a practical matter. State commissions will, by virtue of the proceedings associated with reviewing an exemption, suspension or modification, have available much of the information necessary to determine a reasonable period for these LECs to deploy long-term LNP.

At the same time, the Commission must recognize that even carriers who are exempt from the LNP deployment schedule must still incur additional costs in order to process calls to and from areas with ported numbers. For example, as Pacific Bell notes, intermediate networks must be equipped to perform LNP queries. Petition of Pacific Bell at 12-13.⁴ To the extent that these carriers must incur costs of LNP which cannot be avoided, even through a statutory exemption, these costs should be eligible for recovery.⁵

⁴This is equally true of intermediate interexchange networks on interstate calls, and for CMRS providers who are "outside" the wireline network. See, e.g., Comments of USTA on Further Notice, August 16, 1996, at 5.

⁵In its comments on cost recovery, USTA suggested the category of Type 4 costs - costs incurred by carriers for network upgrades outside the area where LNP is deployed. Comments of USTA at 11. At the same time, USTA recommended that traffic sensitive costs associated with

II. The Commission Should Permit State Commissions To Re-Prioritize Areas of Deployment Within a State So Long As the Overall Burden Is Not Increased

Both NEXTLINK and KMC Telecom ask the Commission to adopt standards and procedures by which additional MSAs could be added to the initial deployment schedule or require LECs to accept bona fide requests in areas outside the top 100 MSAs at time frames earlier than those specified in the Order. Petition of NEXTLINK at 2; Petition of KMC Telecom at 2. As discussed below, USTA proposes standards and procedures which will permit state commissions and/or state LNP workshops to accommodate the concerns of these carriers that they not be required to wait until mid-1999 to obtain LNP in certain areas.

First and foremost, neither the Commission nor state regulators should increase the overall burden created by the deployment schedule described in the Order. That deployment schedule is already aggressive and will impose significant burdens on LECs' financial, technical and logistical resources. Moreover, that deployment schedule was based on estimates provided by software vendors concerning the availability of software for at least one long-term LNP method. Order, para. 77. Neither NEXTLINK nor KMC provides any evidence that vendors' ability to manufacture and provide LECs with the necessary software has changed. Because the deployment schedule already stretches existing resources to the limits, any additional deployment outside the top 100 MSAs has the potential to harm competition and increase costs.

Specifically, deploying LNP outside the top 100 MSAs to meet the request of a single carrier could delay portability in areas where it has been requested by many more carriers, thus delaying portability in areas where competition is growing more rapidly. And any additional expense associated with local number portability will eventually be borne by customers of telecommunications services. The Commission's phased deployment schedule attempts to tailor deployment to the needs of competitors, while not overburdening vendors, LECs, and consumers

SS7 links and database queries could be excluded from a shared recovery mechanism and instead recovered through specific per-query charges, depending on the level of cost involved. Id. at 7-8.

with excessive expenses. Additional deployment requirements would upset that balance.

However, as USTA noted in its Petition, that deployment schedule is only a reasonable guess, and should be adjusted in light of actual evidence of emerging local competition to require competitors to identify specific switches from which they desire to port numbers, and to exempt areas where no competitor has submitted a request for interconnection, even within the top 100 MSAs. Petition of USTA at 14. By the same token, evidence that competition is emerging rapidly in an area not in the top 100 MSAs may warrant adjustments to the deployment schedule.

NEXTLINK suggests that the Commission be responsible for reviewing whether there is sufficient evidence of competition to justify accelerating the deployment schedule in a particular area. NEXTLINK suggests that the Commission should solicit the views of state commissions in order to determine whether this test is met. Petition of NEXTLINK at 6-7. As NEXTLINK recognizes, most if not all of the information relevant to this inquiry will be in the possession of state regulators. There is no need to involve the Commission's scarce resources in conducting the case-by-case analysis this type of inquiry involves.

Additionally, many states have formed LNP workshops which involve all local carriers in a cooperative arrangement. And in many states, these groups have already begun to discuss deployment priorities, including identification of specific switches and consideration about resource management. Consequently, USTA recommends that the Commission permit state commissions and/or state LNP workshops to adjust the priorities of the Commission's deployment schedule where LECs so request.

Specifically, each state commission or state LNP workshop could determine that, for their state, LNP deployment should not follow the Commission's time frames, but be adjusted to reflect more closely the needs of new entrants. For example, the Commission's Order provides that, within the state of California, deployment in the Riverside and San Diego MSAs should be

completed by March 1998; others, e.g., Orange Co., need not be completed until June 1998. Still other areas outside of those MSAs may be of interest to competitors. If carrier planning permits, California authorities should be permitted to delay deployment in the Riverside MSA (either certain switches or the entire MSA), in order to bring LNP to the Orange Co. MSA more rapidly, or to include certain exchanges in other areas outside the top 100 MSAs.

But, in recognition of both limits on state regulatory authority, and in recognition of the Commission's prudent consideration of the burden on carriers serving multiple regions, Order, para. 81, state re-prioritization of a carrier's responsibilities should not harm that carrier's ability to deploy LNP in another state. State deployment decisions should be subject to change based on verifiable representations that accelerated deployment in one area could delay deployment in another area outside of the state.

Additionally, the Commission should recognize that in some states or for some carriers, re-prioritization may not be possible or prudent. Many states, e.g., Illinois, have already reached agreement among all the carriers concerned and finalized deployment plans. And, given the enormous task already at hand, it will be important to retain any efficiencies gained by selective deployment in certain areas, and utilization of common infrastructure for all offices served within an MSA.

Particularly in MSAs with early deployment deadlines, LECs will need to finalize deployment schedules in order to allow for budgeting, personnel and other management organization tasks, negotiations with vendors and suppliers, deployment of the network modifications, testing, and other matters. USTA believes that all LECs, the Commission, and state commissions, can work cooperatively to negotiate deployment schedules that more closely suit the needs of competition, while preserving the ability of LECs to meet their current obligations.

USTA also believes that, as suggested by KMC Telecom, LECs should be encouraged to

submit bona fide requests to other LECs earlier than January 1, 1999, provided that no six-month construction obligation is triggered by the filing of such a request. Petition of KMC Telecom at 12-13. Deployment in certain areas outside the top 100 MSAs could begin on January 1, 1999, subject to the limits of vendor availability and internal LEC resources. Early receipt of requests for portability in such areas would help speed deployment by assisting incumbent LECs in planning and budgeting for deployment. USTA encourages LECs to file bona fide requests as soon as they have finalized and confirmed their business plans. USTA also encourages LECs to exchange information about their LNP needs on an informal basis to the greatest extent possible. Such information could speed deployment by assisting in the process of allocating resources to number portability deployment.

At this time, however, not all USTA members are in a position to state in good faith that they expect to be able to fulfill any and all requests to provide LNP in areas outside the top 100 MSAs by December 1998, or within a period of 24 months, as suggested by KMC Telecom. Petition of KMC Telecom at 10. This is particularly true for areas outside the top 100 MSAs where, as the Commission noted, more significant network upgrades may be necessary for carriers operating in these areas. Order, para. 82. But there is no basis for KMC Telecom's gratuitous suggestion that LECs "inevitably will drag their feet" in honoring requests for LNP in smaller MSAs. Some such requests could be fulfilled within 24 months, depending on the particular circumstances involved. There is no need for additional federal deadlines.

USTA suggests that such requests could be fulfilled on a negotiated timetable, subject to the prioritization discussions occurring in a particular state.⁶ This arrangement would be consistent with the Commission's careful balancing of the importance of LNP to competition with the resource limitations of LECs and their suppliers.

⁶Of course, to the extent that the request for LNP is made of a company subject to Section 251(f), state commissions will have to determine first whether any exemption, suspension or modification of the interconnection obligations should be lifted. See supra.

III. The Commission Need Not Address Arrangements For Sharing Access Charges in An Interim Number Portability Environment

MCI asks the Commission to clarify the treatment of access charges in conjunction with interim LNP. MCI essentially asks that the Commission impose a formula for the appropriate split of access charges, and determine that additional switching and transport costs should be recovered through a competitively neutral surcharge mechanism based on each carrier's share of total telephone numbers or access lines in the portability area. Such a mechanism would involve allocation of such costs through a pooling mechanism administered through state commissions. See Petition of MCI at 4-5. A variant of this proposal was raised by MCI at earlier stages in this proceeding. See Order, para. 117.

MCI notes that interim LNP creates additional switching and transport costs. These additional costs, according to MCI, are "costs of local number portability" subject to the standards of Section 251(e)(2) of the Act. Moreover, the level of these costs is significant enough that MCI apparently believes they justify a separate cost recovery pool,⁷ administration of that pool by state commissions, and allocation of the costs to [almost] all telecommunications carriers.⁸

The Commission need not adopt MCI's suggestion to allocate the incremental costs of

⁷In its reply comments on LNP cost recovery, MCI argues that cost pooling across all telecommunications carriers is inefficient and instead recommends that carrier-specific network upgrades be borne by individual carriers. Reply Comments of MCI at 6-8. Not surprisingly, MCI is more than willing to have other carriers bear a share of the costs of LNP involved with access services provided to interexchange carriers, while it counsels against any proposal which would require it to bear a share of other types of costs of LNP specific to incumbent LECs.

⁸MCI proposes to allocate costs to all telecommunications carriers based on each carrier's share of total telephone numbers or access lines. Of course, as USTA noted in its Reply Comments in this docket, allocation based on telephone numbers does not encompass "all telecommunications carriers," since generally only local exchange carriers and CMRS providers are assigned telephone numbers. Reply Comments of USTA at 6-7.

interim portability through a single nationwide pooling mechanism. Interim LNP services are provided either through local service tariffs governed by state commissions, or as negotiated terms as part of an interconnection arrangement. See Order, para. 124 (“incumbents and new entrants have voluntarily negotiated a variety of cost recovery methods [for interim local number portability]”). See, e.g., Order, para. 136. There is no basis to interfere with this process by establishing a single preferred method for pricing interim local number portability services. Rather, the Commission should reaffirm its conclusion to permit states to “continue using a variety of approaches that are consistent with the statutory mandate.” Order, para. 127.

Similarly, the arrangements by which carriers share access charges in an interim number portability environment are, as the Commission contemplated, privately negotiated arrangements. There is no need for further Commission involvement in determining how the meet-point billing arrangements used for access billing in an interim number portability environment should be structured. As the Commission correctly noted, “it is up to the carriers whether they each issue a bill, or whether one of them issues a bill to the IXC covering all of the transferred calls and shares the correct portion of the revenues with the other carriers involved.” Order, para. 140. The Commission should also reaffirm its conclusion on this matter.

Particularly given MCI's support for a shared cost allocation mechanism for carrier-specific costs of interim LNP, the Commission should give careful thought to this analysis of the statutory cost recovery provisions as applied to carrier-specific costs of long-term LNP. Under the Order, the incremental costs of interim LNP cannot be borne solely by the carrier purchasing those services. See, e.g., Order, para. 138. Essentially, the Commission determined that the “competitively neutral” standard requires that the Commission put competitive new entrants in the same shoes as incumbent LECs who do not require number portability to serve their customers. That is, carriers who obtain interim number portability services should pay the same as carriers who do not - something “close to zero.” Otherwise, an incumbent (or a new entrant who provides service through resale) who does not generate any costs of interim LNP would have an impermissible cost advantage. Order, para. 132-134.

If the Commission affirms this analysis, these principles have consequences for long-term number portability. Under this analysis, new entrants who enter the market by resale, and who therefore incur zero costs of modifying their networks to provide number portability, would have an impermissible cost advantage over carriers who do incur such costs. And facilities-based new entrants who incur lower per-customer costs because they can serve only a few selected high-volume customers and who have lower up-front costs of network modification have a distinctively lower incremental per-customer costs than incumbents who must make long-term LNP available in all areas facing competition, regardless of cost and must upgrade older equipment. If LECs must share all the economies created by their incumbency with competitors, then competitors must similarly share the burden of upgrading the incumbent network for long-term local number portability. If the Commission retains this analysis of the competitively neutral standard for interim LNP, it should carry it through to long-term LNP in a consistent fashion.

CONCLUSION

The Commission should reconsider its First Report and Order on local number portability consistent with the recommendations described above.

Respectfully submitted,
UNITED STATES TELEPHONE ASSOCIATION

BY Keith Townsend

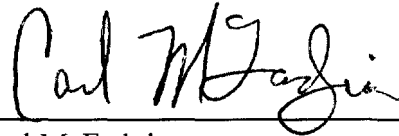
Mary McDermott
Linda Kent
Charles D. Cosson
Keith Townsend

1401 H Street, N.W., Suite 600
Washington, DC 20005
(202) 326-7249

September 27, 1996

CERTIFICATE OF SERVICE

I, Carl McFadgion, do certify that on September 27, 1996 copies of the Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the person on the attached service list.

A handwritten signature in black ink, reading "Carl McFadgion", written over a horizontal line.

Carl McFadgion

Matt Hartun
Federal Communications Commission
1919 M Street, NW
Room 544
Washington, DC 20554

Carol Matthey
Federal Communications Commission
1919 M Street, NW
Room 544
Washington, DC 20554

Jason Karp
Federal Communications Commission
1919 M Street, NW
Room 544
Washington, DC 20554

Jeannie Su
Federal Communications Commission
1919 M Street, NW
Room 544
Washington, DC 20554

Robert Schoonmaker
GVNW Inc.
2270 La Montana Way
Colorado Springs, CO 80918

Richard J. Metzger
Association for Local Telecommunications
Services
1200 19th Street, NW
Suite 560
Washington, DC 20036

Saul Fisher
Thomas J. Farrelly
NYNEX
1095 Avenue of the Americas
New York, NY 10036

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chtd.
3000 K Street, NW
Washington, DC 20007

Richard A. Askoff
NECA
100 South Jefferson Road
Whippany, NJ 07981

Stephen G. Kraskin
Thomas J. Moorman
Kraskin & Lesse
2120 L Street, NW
Suite 520
Washington, DC 20037

Harold L. Stoller
Richard S. Walters
Illinois Commerce Comm.
527 East Capitol Avenue
P.O. Box 19280
Springfield, IL 62794

Frank W. Krogh
Donald J. Elardo
MCI
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Sydney R. Peterson
Niagara Telephone Co.
1133 Main Street
Niagara, WI 54151

Leon M. Kestenbaum
Jay C. Keithley
Sprint
1850 M Street, NW-Suite 1110
Washington, DC 20036

David J. Gudino, HQE03F05
GTE
P.O. Box 152092
Irving, TX 75015

Edward D. Young, III
Michael E. Glover
Randal S. Milch
Bell Atlantic
1320 N. Court House Road
Arlington, VA 22201

T. Fleming
SWB
One Bell Central
Oklahoma City, OK 73102

Robert M. Wienski
Sam LaMartina
ITN Legal & Regulatory Affairs
8500 W. 110th Street
Suite 600
Overland Park, KS 66210

Dennis C. Brown
Brown and Schwaninger
1835 K Street, NW
Suite 650
Washington, DC 20006

Jonathan E. Canis
Reed Smith Shaw & McClay
1301 K Street, NW
Suite 1100 - East Tower
Washington, DC 20005

J. Christopher Dance
Kerry Tassopoulos
Excel Telecommunications, Inc.
9330 LBJ Freeway
Suite 1220
Dallas, TX 75243

Gail L. Polivy
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Lawrence W. Katz
Bell Atlantic
1320 N. Court House Road
Arlington, VA 22201

Lisa M. Zaina
OPASTCO
21 Dupont Circle, NW
Suite 700
Washington, DC 20036

Theodore Case Whitehouse
Michael F. Finn
Willkie Farr & Gallagher
1155 21st Street, NW
Washington, DC 20036

Albert Halprin
Joel Berstein
Halprin, Temple, Goodman and Sugrue
1100 New York Avenue, NW
Suite 650E
Washington, DC 20005

Michael B. Adams, Jr.
Law Office of Thomas K. Crowe, PC
2300 M Street, NW
Suite 800
Washington, DC 20037

Michael J. Shortley, III
Frontier
180 South Clinton Avenue
Rochester, NY 14646

Teresa Marrero
Teleport Communications Group, Inc.
One Teleport Drive
Suite 300
Staten Island, NY 10310

Mark J. Golden
Robert L. Hoggarth
Personal Communications Industry Assn.
500 Montgomery Street
Suite 700
Alexandria, VA 22314

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
NARUC
1201 Constitution Avenue, NW - Suite 1102
Washington, DC 20044

Danny E. Adams
Steven A. Augustino
Kelley Drye & Warren, LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036

Philip F. McClelland
Irwin A. Popowsky
Office of Attorney General
Office of Consumer Advocacy
1425 Strawberry Square
Harrisburg, PA 17120

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
People of the State of Calif. and PUC of Calif.
505 Van Ness Avenue
San Francisco, CA 94102

Glenn S. Rabin
ALLTEL Corporate Services, Inc.
655 15th Street, NW
Suite 200
Washington, DC 20005

Ann P. Morton
Cable & Wireless, Inc.
8219
Vienna, VA 22182

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro & Morin, LLP
2101 L Street, NW
Suite 601
Washington, DC 20036

Assemblyman Anthony J. Genovesi
Legislative Office Building
Room 456
Albany, NY 12248

Jackie Follis
PUC of Texas
7800 Shoal Creek Boulevard
Austin, TX 78757

Judith St. Ledger-Roty
Reed Smith Shaw & McClay
1301 K Street, NW
Suite 1100 - East Tower
Washington, DC 20005

David L. Meier
Cincinnati Bell
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201

Kathryn Marie Krause
U S WEST
1020 19th Street, NW
Suite 700
Washington, DC 20036

Mark C. Rosenblum
Leonard J. Cali
Judy Sello
AT&T Corp.
295 North Maple Avenue - Room 3244J
Basking Ridge, NJ 07920

William B. Barfield
M. Robert Sutherland
A. Kirven Gilbert III
BellSouth
1155 Peachtree Street, NE - Suite 1700
Atlanta, GA 30309

Danny E. Adams
Steven A. Augustino
Kelley Drye & Warren, LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036

Catherine R. Sloan
Richard L. Fruchterman
Richard S. Whitt
Worldcom, Inc. d/b/a LDDS WorldCom
1120 Connecticut Avenue, NW - Suite 400
Washington, DC 20036

Compuserve Inc.
5000 Arlington Centre Boulevard
P.O. Box 20212
Columbus, OH 43220

Bradley Stillman
Consumer Federation of America
1424 16th Street, NW
Suite 604
Washington, DC 20036

Cindy Z. Schonhaut
Intelcom Group (USA), Inc.
9605 East Maroon Circle
Englewood, CO 80112

James D. Ellis
Robert M. Lynch
David F. Brown
SBC Communications Inc.
175 E. Houston - Room 1254
San Antonio, TX 78205

Genevieve Morelli
The Competitive Telecommunications Assn.
1140 Connecticut Avenue, NW
Suite 220
Washington, DC 20036

Margaret E. Garber
Pacific Telesis Group
1275 Pennsylvania Avenue, NW
Fourth Floor
Washington, DC 20004

Joseph P. Markoski
Marc Berejka
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044

Randolph J. May
Bonding Yee
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Charles C. Hunter
Hunter & Mow, PC
1620 Eye Street, NW
Suite 701
Washington, DC 20006

David A. Gross
Kathleen Q. Abernathy
AirTouch Communications, Inc.
1818 N Street, NW
Suite 800
Washington, DC 20036

Pamela Riley
AirTouch Communications, Inc.
One California Street
San Francisco, CA 94111

David N. Porter
MFS Communications Company, Inc.
3000 K Street, NW
Suite 300
Washington, DC 20007

Virginia J. Taylor
California Department of Consumer Affairs
400 R Street
Suite 3090
Sacramento, CA 95814

David A. Irwin
Irwin, Campbell & Tannenwald, PC
1730 Rhode Island Avenue, NW
Suite 200
Washington, DC 20036

Marlin D. Ard
Nancy Woolf
140 New Montgomery Street
Room 1530A - 15th Floor
San Francisco, CA 94105

Charles V. Gerkin, Jr.
Chorey, Taylor & Feil, PC
3399 Peachtree Road, NE
Suit 1700 - The Lenox Building
Atlanta, GA 30326

Cynthia B. Miller
Florida PSC
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Carl W. Northrop
Christine M. Crowe
Paul, Hastings, Janofsky & Walker
1299 Pennsylvania Avenue, NW
10th Floor
Washington, DC 20004

Andrew D. Lipman
Erin M. Reilly
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20007

Betty D. Montgomery
Ann E. Henkener
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Michael Altschul
Randall S. Coleman
Cellular Telecommunications Industry Assn.
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Mark J. Tauber
Mark J. O'Connor
Piper & Marbury, LLP
1200 19th Street, NW
Seventh Floor
Washington, DC 20036

Eric Witte
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

Maureen O. Helmer
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223

Larry A. Peck
Frank M. Panek
Ameritech
2000 West Ameritech Center Drive
Room 4H86
Hoffman Estates, IL 60196

Bruce Beard
Southwestern Bell Mobile Systems
17330 Preston Road
Suite 100A
Dallas, TX 75252

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Comms., Inc.
800 Connecticut Avenue, NW - Suite 1001
Washington, DC 20006

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
People of the California and the PUC of Calif.
505 Van Ness Avenue
San Francisco, CA 94102

J. Roger Wollenberg
John H. Harwood II
Jonathan J. Frankel
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037

Richard J. Metzger
Association for Local Telecommunications Services
1200 19th Street, NW
Suite 560
Washington, DC 20036

Thorvald A. Nelson
Colorado Office of Consumer Counsel
1580 Logan Street
Suite 610
Denver, CO 80203

Durward D. Dupre
Mary W. Marks
Southwestern Bell Telephone Co.
One bell Center
Room 3558
St. Louis, MO 63101

David Cosson
L. Marie Guillory
NTCA
2626 Pennsylvania Avenue, NW
Washington, DC 20037

Mark C. Rosenblum
Roy E. Hoffinger
Clifford K. Williams
AT&T
295 North Maple Avenue - Room 325211
Basking Ridge, NJ 07920

Dan L. Poole
Jeffrey S. Bork
U S WEST
1020 19th Street, NW
Suite 700
Washington, DC 20036

Michael J. Shortley, III
Frontier Corp.
180 South Clinton
Rochester, NY 14646

Anthony Marquez
Colorado PUC
1580 Logan Street
Office Level Two
Denver, CO 80203

James S. Blaszak
Levine, Blaszak, Block & Boothby
1300 Connecticut Avenue, NW
Suite 500
Washington, DC 20036

David L. Meier
Cincinnati Bell
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201

Campbell L. Ayling
NYNEX
1111 Westchester Avenue
White Plains, NY 10604

M. Robert Sutherland
Richard M. Sbarrata
Theodore R. Kingsley
BellSouth
1155 Peachtree Street, NE - Suite 1700
Atlanta, GA 30309

Charles C. Hunter
Catherine M. Hannan
Hunter & Mow, PC
1620 Eye Street, NW
Suite 701
Washington, DC 20006

Riley M. Murpny
James C. Falvey
American Communications Services, Inc.
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

Jill Lyon
American Mobile Telecommunications Assn., Inc.
1150 18th Street, NW
Suite 250
Washington, DC 20036

John T. Scott, III
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Dana Frix
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20007

Brian Conboy
Sue D. Blumenfeld
Thomas Jones
Willkie Farr & Gallagher
1155 21st Street, NW
Washington, DC 20036

Jody B. Burton
GSA
Office of General Counsel
Washington, DC 20405

Loretta J. Garcia
Donald J. Elardo
MCI
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Brad E. Mutschelknaus
Edward A. Yorkgitis, Jr.
Kelley Drye & Warren, LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036

Elizabeth R. Sachs
Lukas, McGowan, Nace & Guiterrez
1111 19th Street, NW
12th Floor
Washington, DC 20036

J. Scott Bonney
Nextlink Communications, LLC
155 108th Avenue, NE
Bellevue, WA 98004

Daniel M. Waggoner
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101

John Staurulakis, Inc.
6315 Seabrook Road
Seabrook, MD 20706

ITS
1919 M Street, NW
Room 246
Washington, DC 20554

Richard L. Cys
1155 Connecticut Avenue, NW
Suite 700
Washington, DC 20036

Susan Drombetta
SCG, Inc.
575 Scherers Court
Worthington, OH 43085

Steve McLellan
Washington Utilities and Transportation
Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504